

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Dynamax Corporation
2745 Northland Drive
Elkhart, IN 46514**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-14698-00536	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 21, 2002 Expiration Date: May 21, 2007

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5]
- B.3 Enforceability [326 IAC 2-7-7]
- B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
- B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]
- B.12 Emergency Provisions [326 IAC 2-7-16]
- B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
- B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-7-4]
- B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.19 Permit Revision Under Economic Incentives and Other Programs
- B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
- B.21 Source Modification Requirement [326 IAC 2-7-10.5]
- B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]
- B.23 Transfer of Ownership or Operation [326 IAC 2-7-11]
- B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-7-6(1)]

- C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.12 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5][326 IAC 2-7-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Two (2) Paint Booths, PB₁ and PB₂

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Hazardous Air Pollution (New Source Toxics Control) [326 IAC 2-4.1-1] [326 IAC 8-1-6]
- D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]
- D.1.3 Volatile Organic Compound (VOC) [326 IAC 8-1-6]
- D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-4]
- D.1.6 Hazardous Air Pollutants (HAP)

Compliance Monitoring Requirements

- D.1.7 Particulate Matter (PM)
- D.1.8 Monitoring

Record Keeping and Reporting Requirements

- D.1.9 Record Keeping Requirements

Certification

Emergency Occurrence Report

Semi-Annual Natural Gas Fired Boiler Certification

Quarterly Deviation and Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary recreational vehicle production plant which includes motor homes, campers, vans etc.

Responsible Official:	DeWayne Creighton Jr. (President)
Source Address:	2745 Northland Drive, Elkhart, Indiana, 46514
Mailing Address:	P.O. Box 1948, Elkhart, IN 46515-1948
General Source Phone Number:	219-262-3474 ex 231
SIC Code:	3716
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Major Source, Section 112 of the Clean Air Act
	Minor Source, under PSD or Emission Offset Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of general assembly operations and two (2) paint booths, identified as PB1 and PB2, using HVLP spray guns, using dry filters for overspray control, and exhausting to stacks S1, S2, S3 and S4.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

Welding operation; one (1) steel MIG welding station, with a maximum wire consumption rate of 0.33 pounds of wire per hour (lb wire/hr), four (4) aluminum MIG welding stations, each with a maximum wire consumption rate of 0.50 lb wire/hr, two (2) oxyacetylene flame cutters, each with a maximum cutting rate of 28 inches per minute, and one (1) plasma cutter, with a maximum cutting rate of 155 inches per minute. [(326 IAC 6-3-2) covered under C.1]

- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

- (c) Others activities not previously identified: [(326 IAC 6-3-2) covered under C.1]

- (a) Woodworking operation with a maximum throughput of 1085 pounds of wood per hour, which consists of various woodworking equipment; and

- (b) Sanding operations.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.

- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from the welding, sanding, and wood working operations not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40

CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be

implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour (this time frame is determined on a case by case basis) until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in

effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the

applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification

by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

The source consists of general assembly operations and of two (2) paint booths, identified as PB1 and PB2, using HVLP spray guns, using dry filters for overspray control, and exhausting to stacks S1, S2 S3 and S4.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Hazardous Air Pollution (New Source Toxics Control) [326 IAC 2-4.1-1]

Pursuant to 326 IAC 2-4.1-1, any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

Pursuant to a Permit No. MSOP 039-12002-00536, issued on July 7, 2000, the Maximum Achievable Control Technology (MACT) for the two (2) paint booths (PB1 and PB2), has been determined. The permit also indicated that adherence with the MACT conditions will also satisfy BACT, so HAP/VOC were described in this section. However, New Source Toxics Control [326 IAC 2-4.1-1] governs only HAP emission, not VOC emission. Therefore, only HAP will be covered in this D.1.1 section and VOC governed by BACT will be covered in D1.3 section [Volatile Organic Compound (326 IAC 8-1-6)]

Pursuant to a Permit No. MSOP 039-12002-00536, issued on July 7, 2000, the Maximum Achievable Control Technology (MACT) for the two (2) paint booths (PB1 and PB2), has been determined as follows:

Cleaning and Prepping Motor Homes Exteriors Prior to Painting, Primer Applications, and Base Coat Applications:

Motor home and camper exteriors shall be hand-wiped with a cleaning solvent prior to the application of the first surface coating system. Cleaning solvents shall contain no more than 6.5 lbs of HAP per gallon lacquer thinners and prep cleaners.

Primer shall be applied using HVLP (high volume-low pressure) or equivalent spray equipment for better transfer efficiency.

Base Coat / Clear Coat Application:

Base coat and clear coats shall be applied using HVLP (high volume low pressure) or equivalent spray equipment. The base coat / clear coat system shall be used on motor homes and campers at this facility. Because mixing supplier coatings creates blistering, chipping, peeling and delamination problems the base coats applied shall have no more than HAP content of 6.2 lbs of HAP per gallon applied and the clear coats applied shall have no more than HAP content of 4.4 lbs of hap per gallon applied. Compliance demonstration shall be based on required parts

in formula mixes.

Chassis Painting

Chassis paints shall utilize low HAP coatings and high transfer efficiency spray equipment. The equipment used shall be airless air-assisted or HVLP or equivalent.

Undercoating

Vehicles shall be undercoated with a low HAP undercoat or with a waterborne undercoat. Airless spray equipment or its equivalent shall be used for transfer efficiency.

Side Wall Lamination, Head Liners

Adhesives utilized in the side wall lamination and head liner area shall be applied with high volume low pressure (HVLP) spray systems or airless air-assisted systems. The use of hot melt adhesives systems shall be utilized in areas that do not need high force clamping or that are not contoured in such a way to prohibit proper adhesion.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from the two (2) paint booths, identified as PB1 and PB2, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Dry filters shall be in operation at all times the paint booths (PB1 and PB2) are in operation in order to comply with this limit.

D.1.3 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to a Permit No. MSOP 039-12002-00536, dated July 7, 2000, the Best Achievable Control Technology (BACT) requirement for VOC for the two paint booths; PB1 and PB2, are as follows:

- (1) Use of no more than base coat colors 6.2 lb of VOC per gallon and clear coat systems 4.4 lbs of VOC per gallon
- (2) Use of no more than 1.8 lbs of VOC per gallon to zero VOC undercoating systems
- (3) Use of hot melt adhesives and aerosol adhesives where possible
- (4) Use of HVLP or equivalent spray equipment in the painting operations
- (5) Use of air-assisted airless or airless or equivalent spray equipment in adhesive applications
- (6) Use of Good Housekeeping Practices:
 - (a) Sealed lids on containers not in use or in storage
 - (b) Gun and line purging into approved containers
 - (c) Organized spill response and cleanup
 - (d) Routine maintenance of spray equipment to prevent drips leaks, and spills.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the emissions units and their control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.3. shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Hazardous Air Pollutants (HAP)

Compliance with the HAP content and usage limitations contained in Conditions D.1.1. shall be determined by the manufacture's certified product data sheet or the manufacture's material safety data sheet.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM)

Pursuant to a Permit No. MSOP 039-12002-00536, issued on July 7, 2000, the dry filters for PM control shall be in operation at all times when the two (2) paint booths (PB1 and PB2) are in operation.

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booths (PB1 and PB2) stacks (S1, S2, S3 and S4) while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

Prior to public notice, company representative, has made comments regarding the record keeping requirements, stating that the company is required a HAP and VOC content limit on the type of material used and no limit on the emissions, therefore maintaining monthly records on VOC and HAP usage is unnecessary. Following the comments, IDEM, OAQ has revised the record keeping requirements to remove a log of the dates use and the total VOC and HAP usage for each month, to require record keeping to be as follows:

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3 the Permittee shall maintain records of the content of VOC and HAP of each coating material and solvent used.

Records shall include purchase orders, invoices, material safety data sheets (MSDS) and calculations necessary to verify the VOC and HAP content of each resin or gel coat and cleaning solutions used. Records shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP material content established in Condition D.1.1. and D1.3.

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Dynamax Corporation
Source Address: 2745 Northland Drive, Elkhart, IN 46514
Mailing Address: P.O. Box 1948, Elkhart, IN 46515-1948
Part 70 Permit No.: T039-14698-00536

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Phone: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Dynamax Corporation
Source Address: 2745 Northland Drive, Elkhart, IN 46514
Mailing Address: P.O. Box 1948, Elkhart, IN 46515-1948
Part 70 Permit No.: T039-14698-00536

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); andC The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |
|---|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Dynamax Corporation
Source Address: 2745 Northland Drive, Elkhart, IN 46514
Mailing Address: P.O. Box 1948, Elkhart, IN 46515-1948
Part 70 Permit No.: T039-14698-00536

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description:

Source Name: Dynamax Corporation
Source Location: 2745 Northland Drive, Elkhart, IN 46514
County: Elkhart
SIC Code: 3716
Operation Permit No.: T039-14698-00536
Permit Reviewer: Lek R. Traivaranon

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Dynamax Corporation relating to the operation of motor home production plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of general assembly operations and two (2) paint booths, identified as PB1 and PB2, using HVLP spray guns, using dry filters for overspray control, and exhausting to stacks S1, S2 S3 and S4.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S1 and S2	Paint booth 1 w/ HVLPs	32	4	30,750 each	ambient
S3 and S4	Paint booth 2 w/ HVLPs	32	4	30,750 each	ambient
GV-1	Welding	20	2.5	7,500	ambient
GV2-6	General assembly	20*	4.5	40,000 each	ambient
GV 7 and 8	Welding	20*	2.5	7,500 each	ambient
GV 9 and 10	Paint Mix & Storage	10*	21" square	1,000 each	ambient
GV 11	Water test room	16*	1.33	2,000	ambient
GV 12 and 13	CO exhaust	16	1.17	800 each	ambient

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, identified as MAU-1, MAU-2, each with a maximum heat input capacity of 6.875 million (MM) British thermal units (Btu) per hour;
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3](cover under C.1)
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4](cover under C.5)
- (g) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (i) Filter or coalescer media changeout.
- (j) One (1) general assembly operation, exhausting to general ventilation.
- (k) Other categories with emissions below insignificant thresholds; [326 IAC 6-3](cover under C.1)
 - (a) Welding operation; one (1) steel MIG welding station, with a maximum wire consumption rate of 0.33 pounds of wire per hour (lb wire/hr), four (4) aluminum MIG welding stations, each with a maximum wire consumption rate of 0.50 lb wire/hr, two (2) oxyacetylene flame cutters, each with a maximum cutting rate of 28 inches per minute, and one (1) plasma cutter, with a maximum cutting rate of 155 inches per minute
 - (b) Woodworking operation with a maximum throughput of 1085 pounds of wood per hour, which consists of various woodworking equipment; and
 - (c) Sanding operations.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP 039-12002-00536 issued on 07-07-2000; and
- (b) AA 039-12851-00536 issued on 11-03-2000.

All conditions from previous approvals were incorporated into this Part 70 permit.

Note:

The words "lbs/voc" were replaced by "lbs of VOC" and the words "lbs/voc/hap" were replaced by "lbs of HAP". This rewording is to clarify the intent of 326 IAC 2-4.1-1 and 326 IAC 8-1-6. The 326 IAC 2-4.1-1 governed only HAP emissions, therefore any reference to VOC has been removed from this section. However, these changes did not affect the emission limitation.

In addition, a separate 326 IAC 8-1-6 section has been added to reflect that the VOC limitation original listed under the permit (MSOP 039-1220-00536)'s NEW Source Toxics Section, should be clearly addressed under 326 IAC 8-1-6 since such rule governs VOC emissions.

The emission limitation of HAP, controlled by MACT, was described in 326 IAC 2-4.1-1 (New Source Toxics Control) and the emission limitation of VOC, controlled by BACT, was described in 326 IAC 8-1-6 (General Reduction Requirement for New Facilities). Therefore, the words "adherence with the MACT conditions will also satisfy 326 IAC 8-1-6 (BACT)" were removed from this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on July 23, 2001 and a notice of administrative completeness letter was mail to the source on August 13, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A pages 1 through 5.)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	24.76
PM-10	25.11
SO ₂	0.04
VOC	233.05
CO	5.06
NO _x	6.02

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	43.38
Toluene	30.24
Hexane	11.72
MEK	27.82
Styrene	8.27
Dipropylene glycol	0.22
Dimethyl phthalate	0.07
Methyl methacrylate monomer	10.68
Methylene diphenyl diisocyanate	0.03
Ethyl benzene	6.41
MIK	4.11
Methanol	0.36
Benzene	0.03
Trichloroethylene	0.23
2,4 Toluene diisocyanate	0.00
Hexamethyl 1,6-dissoc	0.34
Manganese	0.05
TOTAL	143.96

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAP*	HAPs
PB**1+PB**2	1.17	1.17	-	232.72	-	-	43.38	143.91
Insignificant Act.	1.34	1.34	-	0.33	-	-	0.05	0.05
Total Emissions	2.51	2.51	-	233.05	-	-	43.43	143.96

(* Single HAP)

(** Paint booth)

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). According to the application, the two paint booths (PB1 and PB2) are the only significant HAP emitting facilities.

Pursuant to a Permit MSOP 039-12002-00536 issued on July 7, 2000 and the updates described under the "existing approvals" section, Maximum Achievable Control Technology (MACT) for specific processes requirements, has been determined to be as follows:

Cleaning and Prepping Motor Homes Exteriors Prior to Painting, Primer Applications, and Base Coat Applications:

Motor home and camper exteriors shall be hand-wiped with a cleaning solvent prior to the application of the first surface coating system. Cleaning solvents shall contain no more than 6.5 lbs of HAP per gallon lacquer thinners and prep cleaners.

Primer shall be applied using HVLP (high volume-low pressure) or equivalent spray equipment for better transfer efficiency.

Base Coat / Clear Coat Application:

Base coat and clear coats shall be applied using HVLP (high volume low pressure) or equivalent spray equipment. The base coat / clear coat system shall be used on motor homes and campers at this facility. Because mixing supplier coatings creates blistering, chipping, peeling and delamination problems the base coats applied shall have no more than HAP content of 6.2 lbs of HAP per gallon applied and the clear coats applied shall have no more than HAP content of 4.4 lbs of HAP per gallon applied. Compliance demonstration shall be based on required parts in formula mixes.

Chassis Painting

Chassis paints shall utilize low HAP coatings and high transfer efficiency spray equipment. The equipment used shall be airless air-assisted or HVLP or equivalent.

Undercoating

Vehicles shall be undercoated with a low HAP undercoat or with a waterborne undercoat. Airless spray equipment or its equivalent shall be used for transfer efficiency.

Side Wall Lamination, Head Liners

Adhesives utilized in the side wall lamination and head liner area shall be applied with high volume low pressure (HVLP) spray systems or airless air-assisted systems. The use of hot melt adhesives systems shall be utilized in areas that do not need high force clamping or that are not contoured in such a way to prohibit proper adhesion.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has the potential to emit more than ten (10) tons per year for of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The facilities paint booths (PB1 and PB2) are subject to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), because it has the potential to emit VOC from each booth greater than 25 tons/yr. Pursuant to the MSOP 039-12002-00536 issued on July 7, 2000, and updated described under the "Existing Approvals" Section, Best Available Control Technology (BACT) requirements are as follows:

- (1) Use of no more than base coat colors 6.2 lb of VOC per gallon and clear coat systems 4.4 lbs of VOC per gallon
- (2) Use of no more than 1.8 lbs of VOC per gallon to zero VOC undercoating systems
- (3) Use of hot melt adhesives and aerosol adhesives where possible
- (4) Use of HVLP or equivalent spray equipment in the painting operations
- (5) Use of air-assisted airless or airless or equivalent spray equipment in adhesive applications
- (6) Use of Good Housekeeping Practices:
 - (a) Sealed lids on containers not in use or in storage

- (b) Gun and line purging into approved containers
- (c) Organized spill response and cleanup
- (d) Routine maintenance of spray equipment to prevent drips leaks, and spills.

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from the welding operation not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from the woodworking and sanding operation not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from the two (2) paint booths, identified as PB1 and PB2, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the paint booths (PB-1 and PB2) are in operation, in order to comply with this limit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

Prior to public notice, the company representative has made comments as follows:

Section D.1.1 and D.1.3 require a HAP and VOC content limit on the type of materials used and no limit on the emissions. Therefore, maintaining monthly records on VOC and HAP usage is unnecessary to determine compliance. Please revise D.1.9 (a)(1) to require only records for the "VOC and HAP content of each coating material and solvent used." Please delete D.1.9 (a)(2) because a log of the dates of use is meaningless for material content limits. Please delete D.1.9 (a)(3) because solvent usage is not limited. Please delete D.1.9 (a)(4) because VOC and HAP usage is not limited monthly and will be tracked and reported annually in the Emission Statement.

Therefore, the requirements on the record keeping has been revised to require the content used, but not the amount used, also a log of the dates of use and the total VOC and HAP usage for each month were removed.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booths (PB1 and PB2) stacks (S1, S2, S3 and S4) while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Conclusion

The construction and operation of this motor home production plant shall be subject to the conditions of the attached Part 70 Operating Permit T039-14698-00536.

Appendix A

Indiana Department of Environmental Management

Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Dynamax Corporation
Source Location: 2745 Northland Drive, Elkhart, IN 46514
County: Elkhart
SIC Code: 3716
Operation Permit No.: T039-14698-00536
Permit Reviewer: Lek R. Traivaranon

On October 31, 2001, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth in Elkhart, Indiana, stating that Dynamax Corporation had applied for a Part 70 Operating Permit to operate a stationary recreational vehicle production Plant which includes motor homes, campers, vans, etc. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit. Bolded language has been added, the language with a line through it has been deleted. The Table of Contents has been modified to reflect these changes.

1. Add the new rule cite to B.2 Permit Term.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

2. B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, ~~except as provided in 326 IAC 2-7-16.~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based~~ or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the

following:

(g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

3. B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with 40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

4. B.14 Prior Permits Superseded was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

5. Remove (b) from B.13 Permit Shield. Since B.14 Prior Permits Superseded has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (b) ~~This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

6. Prompt Reporting of Deviations: EPA made it clear that there can not be a requirement to do something in a permit, then say that it's not a deviation when the source does not do it [see 40 CFR 70.6(a)(6)(i)]. IDEM, OAQ may use enforcement discretion in these cases, but IDEM, OAQ can not create as exemption through the TV permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do does~~ not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

7. Certification by Responsible Official Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ have re-visited this issue with EPA. EPA asked that IDEM, OAQ clarify C.7 so that the Permittee understands that the asbestos notification should be certified by the owner or operator and not the responsible official. IDEM, OAQ have also changed C.16, it now requires a certification by the R.O. for the notification sent in response to non-compliance with a stack test.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

8. Excuse from Monitoring Failures This condition has changed several times between negotiations with EPA and the CASE Coalition. EPA's main concern was with (f), Part 70 does not allow an excuse from reporting failures. IDEM, OAQ may use enforcement discretion, but IDEM, OAQ can not create an exemption through the permit. The rest of the changes were more or less an attempt to re-organize the condition and clarify it's intent. Paragraph (a) contained more of a speech than an actual requirement, now it simply states the source is required to prepare a CRP. Paragraph (b) requires the source to implement the CRP. Paragraph (c) defines when the source is excused from taking response steps. Paragraph (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or recordkeeping requirements may now be approved as minor permit modifications Paragraph (d) clarifies that corrective action doesn't automatically excuse a deviation. Paragraph (e) defines the recordkeeping requirements. Paragraph (f) clarifies when monitoring is required. The old paragraph (f) has been removed because as described above, IDEM, OAQ do not have the authority through Part 70 to create an exemption from reporting failures.

C.15 Compliance Monitoring **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

- ~~_____ (1) This condition;~~
- ~~_____ (2) The Compliance Determination Requirements in Section D of this permit;~~
- ~~_____ (3) The Compliance Monitoring Requirements in Section D of this permit;~~
- ~~_____ (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
- (5) **A a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ, . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, and maintained on site, and is comprised of:**
- (A)(1) Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and an~~ **expected timeframe for taking reasonable response steps.**
- (B) ~~A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**
- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
- (1) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
- (2) Failure to take reasonable response steps shall constitute a violation of the permit.**
- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is excused ~~from taking~~ **not required to take any** further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.
- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an ~~administrative amendment~~ to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**

- (d)(e) ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e)(f) **Except as otherwise provided by a rule or provided specifically in Section D,** all monitoring as required in Section D shall be performed ~~at all times~~ **when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.** ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~
- (f) ~~At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

The following quoted comments were submitted by Dynamax Corporation on November 29, 2001.

Comment No. 1

Page 4 of 34, A.1 General Information

Please change the language to "The Permittee owns and operates a stationary recreational vehicle production plant which includes motor homes, campers, vans, etc."

Responses No. 1

The following changes have been made as the result of the comment No. 1:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary **recreational** vehicle production plant which includes motor homes, campers, vans etc.

Comment No. 2

Page 12 of 34, B.15 (a) and (c) Deviations from Permit Requirements

Please change the quarterly deviation and compliance monitoring report requirements to a semi-annual report requirement. IDEM is already receiving annual compliance certifications and annual emission reports and there are no other quarterly reporting requirements. This seems unduly burdensome.

Response No. 2

IDEM has authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). OAQ believes that a period of time longer than every quarter will usually

not provide sufficient reporting of continuous compliance.

No changes will be made as a result of Comment No. 2

Comment No. 3

Page 24 of 35, C.19 General Reporting Requirements

Please change the quarterly deviation and compliance monitoring report requirements to a semi-annual report requirement. IDEM is already receiving annual compliance certifications and annual emission reports and there are no other quarterly reporting requirements. This seems unduly burdensome.

Response No. 3

Please see Response No. 2.

Therefore, no changes will be made as a result of Comment No. 2.

Comment No. 4

Page 26 of 34, Facility Description

Please change all references to the description of the source to include the general assembly process as part of the emission unit. The permittee manufactures recreational vehicles, which includes the assembly and the painting of the product. Please change the language to "The source consists of general assembly operations and of two (2) paint booths, identified as PB1 and PB2, using HVLP spray guns, using dry filters for overspray control, and exhausting to stacks S1, S2, S3 and S4" as stated in A.2.

Response No. 5

The following change has been made as a result of comment No. 4:

The source consists of **general assembly operations** and of two (2) paint booths, identified as PB1 and PB2, using HVLP spray guns, using dry filters for overspray control, and exhausting to stacks S1, S2 S3 and S4.

Comment No. 6

Page 26 of 34, D.1.

Please change all references to HAPs to volatile HAPs for clarification.

Response No. 6

As described in the second paragraph of D.1.1 page 26 of 35, HAP and VOC were described in separate conditions of section D.1. HAPs, which refers to combinations of hazardous air pollution or materials/solvents containing hazardous air pollution, is not only limited to volatile HAPs, but it also consists of metal HAPs. Therefore, the conditions in D.1.1 will remain as HAP to encompass all types of HAPs emitted by the two paint booths. The VOC, governed by 326 IAC 8-1-6, is described in condition D.1.3.

No change will be made as a result of Comment No. 6.

Comment No. 7

Page 27 of 34, D.1.2 Particulate Matter

Please add the sentence “dry filters shall be in operation at all times the paint booths (PB1 and PB2) are in operation in order to comply with this limit.”

Response No. 7

The above dry filters are already mentioned in D.1.7, but they can be restated again.

Therefore, the following sentence “**Dry filters shall be in operation at all times the paint booths (PB1 and PB2) are in operation in order to comply with this limit.**” will be added to D.1.2 as a result of Comment No. 7.

Comment No. 8

Page 27 of 35, D 1.4 Preventative Maintenance Plans: This states that the PMP is required for the emissions units and their control devices. PMPs are required only for control devices as stated in B.11 (a)(1) and not the process operations.

Response No. 8

The requirements for PMP are not limited to air pollution control devices. It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) or B.11(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

No change will be made as a result of Comment No. 8.

Appendix A: Emission Calculations

Company Name: Dynamax Corporation
Address City IN Zip: 53103 Northland Drive, Elkhart, IN 46515
Permit ID NO. 039-14698-00536
Reviewer: Lek R. Traivaranon

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Surface Coating Operation	Welding	TOTAL
PM	0.11	23.42	1.23	24.76
PM10	0.46	23.42	1.23	25.11
SO2	0.04	0.00	0.00	0.04
NOx	6.02	0.00	0.00	6.02
VOC	0.33	232.72	0.00	233.05
CO	5.06	0.00	0.00	5.06
total HAPs	0.00	143.91	0.05	143.96
worst case single HAP	0.00	43.38	0.05	43.38
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Surface Coating Operation	Welding	TOTAL
PM	0.11	23.42	1.23	24.76
PM10	0.46	23.42	1.23	25.11
SO2	0.04	0.00	0.00	0.04
NOx	6.02	0.00	0.00	6.02
VOC	0.33	232.72	0.00	233.05
CO	5.06	0.00	0.00	5.06
total HAPs	0.00	143.91	0.05	143.96
worst case single HAP	0.00	43.38	0.05	43.38

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Dynamax Corporation
Address City IN Zip: 53103 Northland Drive, Elkhart, IN 46515
Permit TV No. 039-14698-00536
Reviewer: Lek R. Traivaranon

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

13.75

120.5

Facilities	MMBtu/hr
Make Up Air (MAU-1)	6.875
Make Up Air (MAU-2)	6.875
Total	13.75

Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx 100.0 **see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.11	0.46	0.04	6.02	0.33	5.06

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Page 3 of 5 TSD TV

Company Name: Dynamax Corporation
Address City IN Zip: 53103 Northland Drive, Elkhart, IN 46515
Permit TV No. 039-14698-00536
Reviewer: Lek R. Traivaranon

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
General Assembly																
22 Fluid Ounce Spray Adhesive	5	80.00%	20.00%	60.0%	12.00%	0.00%	0.19000	0.500	3.41	3.00	0.29	6.84	1.25	0.10	0.00	75%
3M 90 High Strength Adhesive	5.76	87.00%	10.00%	77.0%	6.91%	0.00%	0.07000	0.500	4.76	4.44	0.16	3.73	0.68	0.03	0.00	75%
ABS Cement black	7.16	73.00%	0.00%	73.0%	0.00%	0.00%	0.10000	1.000	5.23	5.23	0.52	12.54	2.29	0.00	0.00	100%
ABS Clear Cleaner	6.66	100.00%	0.00%	100.0%	0.00%	0.00%	0.04000	1.000	6.66	6.66	0.27	6.39	1.17	0.00	0.00	100%
B363 Spray Adhesive	5.7	79.20%	15.00%	64.2%	10.26%	0.00%	0.73000	0.500	4.08	3.66	1.34	32.06	5.85	0.47	0.00	75%
Boss 310 Silicone Sealant	8.66	4.00%	0.00%	4.0%	0.00%	0.00%	0.22000	0.500	0.35	0.35	0.04	0.91	0.17	0.00	0.00	100%
Colorimetric MS-101	7.66	41.40%	0.00%	41.4%	0.00%	0.00%	0.06000	0.500	3.17	3.17	0.10	2.28	0.42	0.00	0.00	100%
Crazy Clean	8.33	8.00%	0.00%	8.0%	0.00%	0.00%	0.14000	0.500	0.67	0.67	0.05	1.12	0.20	0.00	0.00	100%
Cyclo Silicone Spray	5.91	91.75%	0.00%	91.8%	0.00%	0.00%	0.02000	0.500	5.42	5.42	0.05	1.30	0.24	0.01	0.00	75%
Dow Corning 999A Silicone Glazing S	8.66	4.00%	0.00%	4.0%	0.00%	0.00%	1.52000	0.500	0.35	0.35	0.26	6.32	1.15	0.00	0.00	100%
Duraglass fiberglass filler	12.99	20.00%	0.00%	20.0%	0.00%	0.00%	0.17000	0.500	2.60	2.60	0.22	5.30	0.97	0.00	0.00	100%
Fill -N- Sand / Light Gray 131s	11.11	41.09%	0.00%	41.1%	0.00%	0.00%	0.04000	0.500	4.57	4.57	0.09	2.19	0.40	0.14	0.00	75%
Final Klean 3909s	8.3	100.00%	94.00%	6.0%	93.66%	0.00%	0.45000	1.000	7.85	0.50	0.22	5.38	0.98	0.00	0.00	100%
Foamseal S7880	9.84	30.00%	0.00%	30.0%	0.00%	0.00%	0.08000	0.500	2.95	2.95	0.12	2.83	0.52	0.00	0.00	100%
GC-33 (Gun Cleaner)	8.2	100.00%	0.00%	100.0%	0.00%	0.00%	0.02000	0.500	8.20	8.20	0.08	1.97	0.36	0.00	0.00	75%
Hi-Point 90 (MEKP) Catalyst	9.25	100.00%	0.00%	100.0%	0.00%	0.00%	0.01000	0.500	9.25	9.25	0.05	1.11	0.20	0.00	0.00	100%
ITW Plexus glue AO420	7.75	3.77%	0.00%	3.8%	0.00%	0.00%	0.74000	0.500	0.29	0.29	0.11	2.59	0.47	3.02	0.00	75%
Lacquer Thinner 3608s	6.61	100.00%	30.00%	70.0%	23.81%	0.00%	0.62000	0.500	6.07	4.63	1.43	34.42	6.28	0.00	0.00	100%
Lite Weight 3 w/ cream hardner	9.95	20.00%	0.00%	20.0%	0.00%	0.00%	1.14000	0.500	1.99	1.99	1.13	27.22	4.97	0.00	0.00	100%
Liquid Nails 601	9.58	35.00%	0.00%	35.0%	0.00%	0.00%	0.03000	0.500	3.35	3.35	0.05	1.21	0.22	0.00	0.00	100%
Old English Scratch Cover Furniture F	7.41	100.00%	0.00%	100.0%	0.00%	0.00%	0.00100	0.500	7.41	7.41	0.00	0.09	0.02	0.00	0.00	100%
Polyster Glazing Putty	15	25.00%	0.00%	25.0%	0.00%	0.00%	0.00200	0.500	3.75	3.75	0.00	0.09	0.02	0.00	0.00	100%
Polytite Polyester Resin	9	38.00%	0.00%	38.0%	0.00%	0.00%	0.31000	0.500	3.42	3.42	0.53	12.72	2.32	0.00	0.00	100%
Premium Adhesive SP6	6.83	72.00%	35.00%	37.0%	28.70%	0.00%	1.14000	0.500	3.54	2.53	1.44	34.57	6.31	1.19	0.00	75%
Prep Sol 3919s	6.4	100.00%	0.00%	100.0%	0.00%	0.00%	0.43000	0.500	6.40	6.40	1.38	33.02	6.03	0.00	0.00	100%
PST Pipe Sealant	10.08	16.90%	0.00%	16.9%	0.00%	0.00%	0.00500	0.500	1.70	1.70	0.00	0.10	0.02	0.00	0.00	100%
RTV 4500 / Silicone - Black	8.66	5.00%	0.00%	5.0%	0.00%	0.00%	0.01000	0.500	0.43	0.43	0.00	0.05	0.01	0.00	0.00	100%
Rubberized Undercoating	7.33	29.20%	0.00%	29.2%	0.00%	0.00%	0.08000	0.500	2.14	2.14	0.09	2.05	0.37	0.23	0.00	75%
Sikaflex 221	9.91	9.00%	0.00%	9.0%	0.00%	0.00%	0.01000	0.500	0.89	0.89	0.00	0.11	0.02	0.00	0.00	100%
Sikaflex 252 Black	9.66	9.77%	0.00%	9.8%	0.00%	0.00%	1.58000	0.500	0.94	0.94	0.75	17.89	3.27	0.00	0.00	100%
Sikaflex 252 White	9.66	9.77%	0.00%	9.8%	0.00%	0.00%	7.28000	0.500	0.94	0.94	3.44	82.45	15.05	0.00	0.00	100%
Sikaflex 255-FC	10	4.40%	0.00%	4.4%	0.00%	0.00%	0.14000	0.500	0.44	0.44	0.03	0.74	0.13	0.00	0.00	100%
Silicone Sealant- Black	8.58	6.07%	0.00%	6.1%	0.00%	0.00%	1.53000	0.500	0.52	0.52	0.40	9.56	1.75	0.00	0.00	100%
Silicone Sealant- Clear	8.58	6.07%	0.00%	6.1%	0.00%	0.00%	0.19000	0.500	0.52	0.52	0.05	1.19	0.22	0.00	0.00	100%
Silicone Sealant- White	8.58	6.07%	0.00%	6.1%	0.00%	0.00%	0.10000	0.500	0.52	0.52	0.03	0.62	0.11	0.00	0.00	100%
Spray N Go - Gloss Black Paint	6.08	85.51%	25.00%	60.5%	18.25%	0.00%	0.11000	0.500	4.50	3.68	0.20	4.86	0.89	0.05	0.00	75%
Spray N Go Dec. Enamel - Flat Black	6.66	90.00%	30.00%	60.0%	23.99%	0.00%	0.09000	0.500	5.26	4.00	0.18	4.32	0.79	0.03	0.00	75%
Spray N Go Decorative Enamel	6.66	72.67%	0.00%	72.7%	0.00%	0.00%	0.04000	0.500	4.84	4.84	0.10	2.32	0.42	0.04	0.00	75%
Spray Rite 16 Fl. Oz. Silicone Spray	5	90.00%	0.00%	90.0%	0.00%	0.00%	0.01000	0.500	4.50	4.50	0.02	0.54	0.10	0.00	0.00	75%
Spray Rite Degreaser & Safety Solvent	10.83	99.00%	0.00%	99.0%	0.00%	0.00%	0.01000	0.500	10.72	10.72	0.05	1.29	0.23	0.00	0.00	75%
StaPut III Spray Adhesive	6.08	75.00%	20.00%	55.0%	14.60%	0.00%	1.47000	0.500	3.92	3.34	2.46	58.99	10.77	1.22	0.00	75%
Titebond Wood Glue	9.16	54.10%	53.80%	0.3%	59.16%	0.00%	0.20000	0.500	0.07	0.03	0.00	0.07	0.01	0.00	0.00	100%
TSS Natural Solvent Clnr.	8.34	74.50%	0.00%	74.5%	0.00%	0.00%	0.01000	0.500	6.21	6.21	0.03	0.75	0.14	0.00	0.00	100%
Underbody Coating*	9.4	55.00%	55.00%	0.0%	62.06%	0.00%	3.00000	1.000	0.00	0.00	0.00	0.00	0.00	2.78	0.00	95%
Urethane Adhesive*	9.16	0.00%	0.00%	0.0%	0.00%	0.00%	0.00300	2.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Urethane Sealant #1000 88-4902	9.16	6.85%	0.00%	6.9%	0.00%	0.00%	0.13000	0.500	0.63	0.63	0.04	0.98	0.18	0.00	0.00	100%
Walnut Spray Stain	6.56	86.30%	35.00%	51.3%	27.56%	0.00%	0.01000	0.500	4.65	3.37	0.02	0.40	0.07	0.00	0.00	75%
Yellow Zinc Phosphate	6.49	73.93%	35.00%	38.9%	27.27%	0.00%	0.08000	0.500	3.47	2.53	0.10	2.43	0.44	0.07	0.00	75%
For Large Units - Full Body Paint																
ChromaPremier Sealer	11.14	41.30%	0.00%	41.3%	0.00%	0.00%	1.15000	0.250	4.60	4.60	1.32	31.75	5.79	2.06	0.00	75%
ChromaBase Basecoats	7.14	86.80%	0.00%	86.8%	0.00%	0.00%	4.27000	0.250	6.20	6.20	6.62	158.78	28.98	1.10	0.00	75%
ChromaBase Colors	7.14	86.80%	0.00%	86.8%	0.00%	0.00%	4.27000	0.250	6.20	6.20	6.62	158.78	28.98	1.10	0.00	75%
ChromaClears	7.9	55.70%	0.00%	55.7%	0.00%	0.00%	2.41000	0.250	4.40	4.40	2.65	63.63	11.61	2.31	0.00	75%
For Small Units - Full Body Paint																
ChromaPremier Sealer	11.14	41.30%	0.00%	41.3%	0.00%	0.00%	0.85000	0.250	4.60	4.60	0.98	23.46	4.28	1.52	0.00	75%
ChromaBase Basecoats	7.14	86.80%	0.00%	86.8%	0.00%	0.00%	3.15000	0.250	6.20	6.20	4.88	117.13	21.38	0.81	0.00	75%
ChromaBase Colors	7.14	86.80%	0.00%	86.8%	0.00%	0.00%	3.15000	0.250	6.20	6.20	4.88	117.13	21.38	0.81	0.00	75%
ChromaClears	7.9	55.70%	0.00%	55.7%	0.00%	0.00%	1.78000	0.250	4.40	4.40	1.96	47.00	8.58	1.71	0.00	75%
For Small Units - Stripe Only																
Adhesion Promotor	7.06	99.94%	17.55%	82.4%	14.87%	0.00%	0.25000	0.500	6.83	5.82	0.73	17.45	3.18	0.00	0.00	75%
ChromaPremier Sealer	11.14	41.30%	0.00%	41.3%	0.00%	0.00%	0.13000	0.500	4.60	4.60	0.30	7.18	1.31	0.47	0.00	75%
ChromaBase Colors	7.14	86.80%	0.00%	86.8%	0.00%	0.00%	0.75000	0.500	6.20	6.20	2.32	55.78	10.18	0.39	0.00	75%
ChromaClears	7.9	55.70%	0.00%	55.7%	0.00%	0.00%	0.75000	0.500	4.40	4.40	1.65	39.60	7.23	1.44	0.00	75%
Miscellaneous Paints																
Low VOC Prime 'N Seal	9	53.33%	0.00%	53.3%	0.00%	0.00%	0.13000	0.500	4.80	4.80	0.31	7.49	1.37	0.30	0.00	75%
Variprime Self-Etching Primer	8.14	72.50%	0.00%	72.5%	0.00%	0.00%	0.00300	0.250	5.90	5.90	0.00	0.11	0.02	0.00	0.00	75%

State Potential Emissions

Add worst case coating to all solvents

53.13

1275.19

232.72

23.42

*Insignificant Activities

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total State Potential Emissions	43.38	30.24	11.72	27.82	8.27	0.22	0.07	10.68	0.03	6.41	4.11	0.36	0.03	0.23	0.00	0.34
---------------------------------	-------	-------	-------	-------	------	------	------	-------	------	------	------	------	------	------	------	------

$$\text{HAPS emission rate (tons/yr)} = \text{Density (lb/gal)} * \text{Gal of Material (gal/unit)} * \text{Maximum (unit/hr)} * \text{Weight \% HAP} * 8760 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs}$$